

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE AT NASHVILLE

JOHN JONES,	)	
	)	
Plaintiff,	)	
	)	
v.	)	NO. 1:14-CV-00114
	)	
CITY OF FRANKLIN, TENNESSEE,	)	JUDGE HAYNES
MARC SWAIN, CARLOS CORDERO,	)	
JEFF CARSON, RYAN FRAZIER,	)	
NICK GRANDY, CORY KROEGER,	)	
DAVID JENKINS, WILLIAMSON	)	
MEDICAL CENTER, SHAWNA M.	)	
DANIEL, R.N., JON ANDREW	)	
RUSSELL, M.D.,	)	
	)	
Defendants.	)	

**DEFENDANTS' MOTION TO FILE THEIR RESPONSE TO  
PLAINTIFF'S MOTION FOR EXTENSION OF TIME UNDER SEAL**

Come now, Williamson Medical Center and Shawna M. Daniel, RN ("the Defendants"), and move to file a pleading under seal. Out of an abundance of caution, these Defendants request permission to file their Response to Plaintiff's Motion for Extension of Time, Doc. 79, under seal because it arguably contains Plaintiff's protected health information. These Defendants have complied with Administrative Order No. 167, §5.07, and filed the Response through ECF immediately after the filing of this motion. A redacted copy of the Response has also been filed. Plaintiff has been served, via e-mail, with an encrypted copy of the unredacted Response to his Motion.

Respectfully submitted,

**GIDEON, COOPER & ESSARY, PLC**

**s/ J. Blake Carter**

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and Shawna M. Daniel, R.N.*

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been furnished, by electronic means via the Court's electronic filing system, this 20th day of July, 2015, to the following:

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**s/ J. Blake Carter**